

EXHIBIT G

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT
OF PENNSYLVANIA

* * * * *

DAMON CHAPPELLE,	*
Plaintiff	* Case No.
vs.	* 11-0304
DAVID VARANO,	*
JOHN DUNN, DEBORAH	*
HERBST, MICHELLE	*
KODACK and RENEE	*
FOULDS,	*
Defendants	*

* * * * *

DEPOSITION OF
JENNIFER SHUROCK
August 16, 2012

CCF

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DEPOSITION

OF

JENNIFER SHUROCK, taken on behalf of the
Defendants herein, pursuant to the Rules of
Civil Procedure, taken before me, the
undersigned, Richard J. Lipuma, a Court Reporter
and Notary Public, in and for the Commonwealth
of Pennsylvania, at the offices of Pennsylvania
Department of Probation and Parole, 1101 South
Front Street, Harrisburg, Pennsylvania, on
Thursday, August 16, 2012 beginning at 9:03 a.m.

A P P E A R A N C E S

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P R O C E E D I N G S

JENNIFER SHUROCK, HAVING FIRST BEEN DULY SWORN,
TESTIFIED AS FOLLOWS:

EXAMINATION

BY ATTORNEY KEATING:

Q. Jennifer, my name is Timothy Keating, here with the Office of Attorney General, and I'm representing the Department of Corrections Defendants in the case of Damon Chappelle, also known as Kevin Jessup, in a federal action against them. And we're here today to take your deposition. You're here with Counsel for the Parole Board. And if at any time you want to take a break and speak with Counsel, feel free to do so, and that's not a problem. Is that understood?

A. Yes.

Q. Okay. Have you ever been deposed before?

A. No.

Q. Typically, the format of the deposition is first I'm going to lay out some ground rules about how to be deposed and how to answer and that sort of thing. And then I'm going to go a

1 little bit into your background, history, your
2 education, where you were born, that sort of
3 thing, and then talk to you about your role and
4 your job with the Pennsylvania Board of
5 Probation and Parole, and what that entails.

6 A. Okay.

7 Q. So for the instructions, first of all, we
8 have a court reporter here, which means that
9 every time you answer a question, it has to be
10 verbally. You can't just shake your head yes or
11 no, shrug your shoulders, or say uh-huh (yes) or
12 uh-uh (no), because we're making a record; okay?

13 A. Yes.

14 Q. Okay. Secondly, if I ask you a question and
15 you don't understand it because I don't speak
16 clearly enough, or slowly enough, tell me that
17 and I'll repeat the question so you understand
18 it.

19 A. Okay.

20 Q. Thirdly, you have to wait for me to finish
21 my question before you answer the question;
22 okay?

23 A. Okay.

24 Q. And I'll try to let you finish your answer
25 before I ask you another question.

1 A. Okay.

2 Q. Sometimes these things take on a
3 conversational type of dialog, but for the
4 record and the transcript, it's --- we try
5 to --- I mean sometimes you will know what my
6 question is going to be ---

7 A. Okay.

8 Q. --- and you'll want to answer it like that.
9 But we'll both try to --- I'll let you finish
10 your answer and you let me finish my question;
11 okay?

12 A. Okay.

13 Q. If I ask you a question that you don't
14 understand because the question itself is
15 confusing the way I ask it, let me know and I
16 will try to rephrase the question; okay?

17 A. Okay.

18 Q. That's fair?

19 A. Yes.

20 Q. Okay. So if I ask you a question and you
21 answer a question, I'm going to assume that
22 you've heard the question, you understood the
23 question, and you're answering the question to
24 the best of your ability, belief, knowledge, and
25 understanding.

1 A. Okay.

2 Q. If you don't know the answer to a question,
3 I don't know is a legitimate answer, as long as
4 you don't know; okay?

5 A. Okay.

6 Q. If you want to estimate, that's fine, but
7 please try not to guess.

8 A. All right.

9 Q. Are you currently on any medication which
10 would impair your ability to understand
11 questions and to answer questions truthfully and
12 honestly?

13 A. No.

14 Q. If I ask you a question at any time that you
15 don't want to answer because it's too personal,
16 or you have concerns about it, let us know and
17 we'll take a break and we'll figure it out;
18 okay?

19 A. Okay.

20 Q. Is that fine? I don't anticipate that, but
21 it happens once in a while. Is there any reason
22 why we should not --- that you can think of that
23 we shouldn't or can't take your deposition
24 today?

25 A. No.

1 Q. The other thing is at the end of the
2 deposition --- well, one thing is we have
3 Attorney Tobin on the line. Once I'm done
4 asking you questions, she'll ask you a series of
5 questions for you to answer. Once we're done
6 with the deposition, we will get a transcript.
7 We will allow you to read the transcript to make
8 sure of its accuracy; okay?

9 A. Okay.

10 ATTORNEY TOBIN:

11 Excuse me, Tim.

12 ATTORNEY KEATING:

13 Yes.

14 ATTORNEY TOBIN:

15 I'm having a hard time hearing Ms.
16 Shurock. And I don't know if there's a way to
17 move the phone possibly closer to her.

18 ATTORNEY TALABER:

19 Just speak a little louder.

20 A. I'll speak up. I'll lean in.

21 BY ATTORNEY KEATING:

22 Q. The other thing is you have to speak up so
23 Counsel --- all Counsel can hear you; is that
24 fair?

25 A. Yes.

1 Q. Okay.

2 ATTORNEY TOBIN:

3 Sounds good.

4 BY ATTORNEY KEATING:

5 Q. Is that better? Okay. Good. Your full
6 name?

7 A. Jennifer A. Shurock, S-H-U-R-O-C-K.

8 Q. And how old are you, Jennifer?

9 A. Thirty-eight (38).

10 Q. And where do you live?

11 A. I live in Coal Township, Pennsylvania.

12 Q. And how long have you lived in Coal
13 Township, Pennsylvania, approximately?

14 A. About eight years.

15 Q. And before Coal Township, Pennsylvania,
16 where did you live?

17 A. Pine Grove, Pennsylvania.

18 Q. Could you tell us a little bit about your
19 educational background?

20 A. I graduated high school in 1992 and I
21 started with the Parole Board two weeks later.
22 I have no college.

23 Q. When you started with the Parole Board in
24 1992, where was it?

25 A. I started in the personnel division.

1 Q. And physically where?

2 A. Here in Harrisburg.

3 Q. Here in Harrisburg?

4 A. Yes.

5 Q. And were you living in Harrisburg at the
6 time?

7 A. No, I was still living in Pine Grove.

8 Q. Did you move to Harrisburg?

9 A. Nope, I never ---.

10 Q. You drove from Pine Grove every day to
11 Harrisburg?

12 A. Yes.

13 Q. Okay. And when you started with the Parole
14 Board in 1992, what position did you start with?

15 A. I started in personnel as the personnel
16 director's secretary.

17 Q. Who was the personnel director?

18 A. At that time, it was Robert E. Yerger.

19 Q. And as the personnel director's secretary,
20 did you say?

21 A. Uh-huh (yes).

22 Q. It wasn't an administrative assistant?

23 A. Not at that point, no.

24 Q. What were your duties, general duties and
25 responsibilities?

1 A. General duties, scheduling meetings, doing
2 travel vouchers, typing memos, dictating, going
3 to meetings, dictating notes, that type of
4 thing.

5 Q. Did you receive any specific training
6 relative to that position?

7 A. Yes.

8 Q. What kind of training did you receive?

9 A. There was mandatory 16 hours of training
10 each year that we had to take. They were just
11 various courses.

12 Q. Now, I assume for the sake of discussion,
13 even back then, you had to take some sort of
14 EEOC training and diversity training?

15 A. Correct.

16 Q. Was that included in the 16 hours of
17 training or was that separate?

18 A. I believe that would have been separate, but
19 it is a while ago.

20 Q. Okay.

21 A. But I mean the code of conduct was something
22 separate that we would have to sign, I believe
23 yearly. You know, review and sign.

24 Q. And how long did you work in that position,
25 approximately?

1 A. I was in personnel approximately three
2 years, four years, before I transferred to the
3 Board Secretary's office.

4 Q. So when you transferred to the Board
5 Secretary's office, would that have been about
6 '95 or '96?

7 A. Approximately.

8 Q. And why did you transfer to the Board
9 Secretary's office?

10 A. I got an administrative assistant job there.
11 I had different promotions in personnel. But
12 when I transferred to the Board Secretary, it
13 was as an administrative assistant.

14 Q. And as an administrative assistant to the
15 Board Secretary, who did you report to?

16 A. At that time, it was W. Conway Bushey.

17 Q. Was W. Conway Bushey the Board Secretary?

18 A. Yes, he was.

19 Q. Do you recall how many people were on the
20 Board?

21 A. At that time, I believe there may have been
22 four or five Board members.

23 Q. You can't look to your attorney to help you
24 out. That's okay.

25 A. I believe there was four or five. There

1 wasn't the current nine; I know that.

2 Q. There's nine now?

3 A. Yes.

4 Q. And how long did you work as administrative
5 assistant for the Board Secretary,
6 approximately?

7 A. I was only there approximately one year and
8 I got a promotion and transferred to our what
9 was then special projects section as a parole
10 staff technician.

11 Q. Special projects ---?

12 A. Section.

13 Q. As a parole staff technician?

14 A. Yes, sir.

15 Q. Where was that located physically?

16 A. Here in Harrisburg.

17 Q. And what was the special projects section?
18 What did that entail?

19 A. They encompassed, at that time, firearms was
20 under them, the Pardon Board investigations was
21 under them, declaring offenders delinquent,
22 absconders was under them. Pretty much it was
23 like the field line to getting memos to the
24 Board, that kind of ---.

25 Q. What was the actual role of the special

1 projects? What exactly did they do?

2 A. They did field audits. They did firearms
3 training.

4 Q. What is a field audit? What does that
5 include?

6 A. Back then, I believe they were parole staff
7 specialists. We'd go out and review the field
8 logs of our agents, you know, review their case
9 notes, make sure everything was the way it was
10 supposed to be, in line with Board policy.

11 Q. Do parole agents, on a regular basis, fill
12 out field logs?

13 A. Correct.

14 Q. And do they fill it out per parolee or per
15 date that they work? Do you know what I'm
16 saying?

17 A. That I am not sure how --- I'm not sure.

18 Q. Do they currently still fill out field logs?

19 A. I believe they do.

20 Q. And what information is contained in a field
21 log?

22 A. It would be their contacts with the
23 offender, collateral contacts with family
24 members, employers, police contact; anything
25 that would happen with that offender.

1 Q. And how long did you work in that capacity?

2 A. Well, I was a parole staff tech for about
3 five or six years in the special project
4 section. I transferred to the interstate
5 services division also as a parole staff
6 technician.

7 Q. And what did you do in that capacity?

8 A. In that capacity, I reviewed incoming cases
9 from other states that they wanted us to
10 supervise for them if it was a dual supervision
11 case, made sure all of the paperwork, all of the
12 documentation was there, sent it to the field
13 for investigation, and then waited for the
14 field's reply to send back to the other
15 interstate office, whether or not the plan was
16 acceptable.

17 Q. And approximately what year was that, if you
18 recall?

19 A. Well, I was there up until 2003, I was in
20 that position. I was a parole staff tech until
21 2003.

22 Q. And when you say dual supervision, would
23 that be relegated only to those individuals who
24 were on parole for offenses that occurred in
25 other states and in Pennsylvania or ---?

1 A. That was the case --- some of those did
2 happen like that. Other times they lived here
3 and got arrested in the other state and were
4 just trying to get home. But dual supervision,
5 yes, means they were on supervision, probation,
6 or parole in another state, and also here in
7 Pennsylvania, whether it be state or county.

8 Q. Would you have instances where a parolee was
9 never convicted of a charge in Pennsylvania but
10 was doing parole for an offense in another state
11 and living in Pennsylvania?

12 A. Correct.

13 Q. Who would pay for that; Pennsylvania or the
14 other state?

15 A. Well, the supervision fee ---.

16 Q. Supervision?

17 A. If an offender, he can't pay supervision
18 fees to two states. So if his case was
19 transferred to Pennsylvania, he would pay the
20 supervision fees to Pennsylvania, not the other
21 state. You can't have it being paid to both
22 states.

23 Q. Okay. If an offender from another state
24 doesn't have a conviction in Pennsylvania, the
25 supervision fee would be paid to Pennsylvania?

1 A. It would be, if we accept the case for the
2 other state.

3 Q. Okay. And that was 2003?

4 A. I was there up until 2003.

5 Q. Where were you after 2003?

6 A. 2003, I got a promotion and went to SCI-Coal
7 Township as a parole agent.

8 Q. Was it parole agent one?

9 A. Yes, for six months, for the training
10 period. It's a six-month training period.

11 Q. And that was a promotion?

12 A. That was a promotion.

13 Q. So a parole agent one is pretty high up the
14 scale, relative to the positions?

15 A. In our agency, yes.

16 Q. And how was it that you applied for and got
17 the position as a parole agent at SCI-Coal
18 Township? Would that have been on any
19 particular bulletin board ---?

20 A. Right. There was a job posting and I
21 applied. I don't know of how many other
22 candidates. Mileage-wise, it was actually
23 closer to my home than Harrisburg was. At that
24 time, I was living in Pine Grove.

25 Q. And did you have to go through any

1 training ---

2 A. Yes.

3 Q. --- after you got accepted to the position?

4 A. Yes, I did.

5 Q. What kind of training and how long did it
6 take?

7 A. I believe at that time, I believe it was a
8 five or six-week basic training program at the
9 Department of Corrections Training Academy,
10 which was like --- every day there, it was a
11 40-hour week there going over Board policy, you
12 know, all the different divisions of the Parole
13 Board, who handled what, what was done in each
14 division.

15 Q. Given your background, a lot of that you
16 already knew?

17 A. Correct. But everyone still has to go
18 through that. As a parole agent, everyone still
19 must go through and successfully complete the
20 basic training academy in order to be certified,
21 in order to ---.

22 Q. Did you have firearm training, too?

23 A. I did not have to take firearms training
24 because I was an institutional agent. The field
25 parole agents would have to do the firearms

1 qualification. Inside, we don't carry. I'm not
2 required to have firearms.

3 Q. When you applied for the position, it was
4 for an institutional parole agent?

5 A. Correct.

6 Q. And can you explain just for the record the
7 difference between a --- I don't know, on the
8 street regular parole agent and an institutional
9 parole agent?

10 A. Well, the institutional parole agent meets
11 with offenders before they're actually released
12 on parole. We prepare their documents, gather
13 information, what they've done inside, whether
14 they have any misconducts.

15 Q. Let's start with something very basic.

16 A. Okay.

17 Q. What institute are we talking about?

18 A. We're at SCI-Coal Township.

19 Q. Okay. So a parole agent, who is an
20 institutional parole agent, is in a state
21 prison?

22 A. Correct.

23 Q. And that's where they work?

24 A. Yes.

25 Q. And a parole agent who is not an

1 institutional parole agent is not in a state
2 prison?

3 A. Correct.

4 Q. Do you know how many state prisons there
5 are?

6 A. I don't.

7 Q. Have you worked in any other state
8 institution other than SCI-Coal Township?

9 A. Not in a fulltime capacity. I've worked
10 overtime at other state institutions. But I've
11 always been stationed at SCI-Coal Township.

12 Q. And that's been since 2003; does that
13 sound ---?

14 A. Correct. Yes.

15 Q. Okay. Back in 2003, do you recall how many
16 institutional parole agents were there?

17 A. At Coal Township?

18 Q. Yes.

19 A. We had three institutional parole agents.

20 Q. What about today?

21 A. Today, we have four.

22 Q. Who else, other than the institutional
23 parole agents, worked for the probation ---
24 Pennsylvania Department of Probation and Parole
25 at Coal Township? Do you understand what I

1 mean?

2 A. Yes. That would still be the same. There
3 was a supervisor.

4 Q. Okay.

5 A. There were two institutional parole
6 assistants. And then back then, there were
7 three parole agents. And now, there's four
8 parole agents.

9 Q. So now there's seven; there used to be six?

10 A. Correct.

11 Q. Do you have your own building in the
12 institution?

13 A. No, we share a building. We each have our
14 own offices, but we share a building with
15 Department of Corrections staff.

16 Q. As an institutional parole agent, what were
17 your duties --- what are your duties and
18 responsibilities? You're still an institutional
19 parole agent; right?

20 A. No, I am not.

21 Q. Okay.

22 A. I'm a parole supervisor.

23 Q. When did you become a parole supervisor?

24 A. January of 2010.

25 Q. Would it be fair to say you are the parole

1 supervisor?

2 A. I am, at Coal Township.

3 Q. There's only one parole ---?

4 A. There is only one.

5 Q. What are the duties and --- have the duties
6 and responsibilities of the institutional parole
7 agents changed between 2003 and today? Are they
8 still the same?

9 A. Basically they're still the same.

10 Q. And basically what are they?

11 A. They are interviewing offenders that are
12 coming up to see the Parole Board for the hopes
13 of getting paroled, gathering material from the
14 Department of Corrections, as far as
15 programming, what they've done while inside,
16 preparing a report for the Board, helping
17 offenders obtain home plans, signing special
18 probation forms, going over conditions of
19 special probation with them, processing
20 hearings, violations hearings, that type of
21 thing. They handle the hearing process.

22 Q. You had indicated, I believe, that there are
23 two assistants also that work in the office?

24 A. Yes.

25 Q. They are ranked below parole agent, I guess?

1 A. They are.

2 Q. Do they have a special title; just assistant
3 parole ---?

4 A. Institutional parole assistant. They are
5 clerical people in the parole office, but their
6 title is institutional parole assistant.

7 Q. Do they interact with inmates on a daily
8 basis?

9 A. They do.

10 Q. Do the institutional parole agents interact
11 with inmates on a daily basis?

12 A. They do.

13 Q. Does the parole supervisor interact with
14 inmates on a daily basis?

15 A. I do.

16 Q. Do you know presently what the approximate
17 inmate population is at Coal Township?

18 A. Approximately, I would say 2,200 plus.

19 Q. And out of that 2,200 plus, can you give me
20 an approximate percentage of how many of those
21 inmates are not under the auspices of the Board
22 of Probation and Parole? Do you understand what
23 I mean?

24 A. No.

25 Q. Would it be correct to say that the parole

1 agents are assigned to inmates who are being ---
2 about to either receive parole or are being
3 returned from parole violations?

4 A. That is correct.

5 Q. So does every inmate have an assigned parole
6 agent, or should they?

7 A. No.

8 Q. Okay. In what instances would they not?

9 A. Guys that minimum dates are like way far
10 out, five, ten years, really have no --- lifers
11 have no interaction with parole, guys with far
12 out minimum dates have no interaction with
13 parole.

14 Q. How soon does an inmate have to get towards
15 their minimum for the Probation and Parole to
16 start looking into the case and start helping
17 them in the file system, approximately?

18 A. I believe it's about eight months before a
19 minimum that we have a parole education class
20 that we start putting guys coming up on their
21 minimum through a parole education class.

22 Q. Okay. And who keeps track of that?

23 A. Our institutional parole assistants run a
24 query, per se, by minimum date. And then those
25 offenders are put in a parole education class.

1 Q. And once they receive that parole education
2 class, are they assigned an institutional parole
3 agent?

4 A. At that point in time, yes. It's documented
5 who their parole agent would be. We go by last
6 number, last institution number. That's how
7 inmates are assigned a parole agent caseload.

8 Q. And do you coordinate with Department of
9 Corrections staff relative to scheduling
10 classes, or trying to get them ready for their
11 parole?

12 A. No. That's something we do on our own.

13 Q. If you need information concerning an
14 inmate's minimum or maximum or sentence, how do
15 you --- what are the sources of information you
16 utilize?

17 A. We would utilize Department of Corrections
18 sentence status summary sheet, which is
19 generated by the records' office.

20 Q. Do you have access to the inmates'
21 Department of Corrections records if necessary?

22 A. We do.

23 Q. Do you know who Michelle Kodack is?

24 A. I do.

25 Q. Who is she?

1 A. She is the records supervisor at SCI-Coal
2 Township.

3 Q. And does the institutional parole officer
4 work with the records staff and the Department
5 of Corrections employees to coordinate
6 information sharing?

7 A. We do.

8 Q. Do you know approximately how many
9 inmates --- inmate cases, each institutional
10 parole agent receives?

11 A. I would say our monthly dockets right now
12 are between 100 --- I mean there's 130 on a
13 docket this month, I believe. We try to divide
14 them up. So I'd say anywhere from 25 to 35
15 cases, you know, get written a month. So if I
16 had to break it down monthly by parole agent,
17 they'd each have that many cases. But more than
18 not, it is --- it wouldn't even be a ballpark
19 guess, how many inmates are assigned to each
20 agent at one time.

21 Q. Because it depends on their institutional
22 parole number; right?

23 A. Yes.

24 Q. Besides getting inmates ready for release on
25 parole, do you offer other services to inmates

1 relative to getting them information on
2 questions they may have about their parole
3 eligibility and their sentencing and that sort
4 of thing?

5 A. They write us request slips and we try to
6 answer their question. If they ask us a
7 question that we know the answer to, we do
8 assist them. We try to point them in the right
9 direction if it's something that we can answer,
10 you know, whether it be to get with your
11 counselor, or get with the records office, or
12 that kind of thing. If it's something we can't
13 answer, we usually try to point them in the
14 right direction.

15 Q. Do you ever go out on the units and speak
16 one on one with the inmates on a regular basis?

17 A. No, we do not.

18 Q. If an inmate sends you a written request, do
19 you ever schedule an appointment to bring them
20 in and interview them, and speak with them about
21 their request?

22 A. If they write us a request slip that says I
23 need to see you, no, we do not. We write back
24 and we tell them write your question on a
25 request slip and we'll --- you know, we'll

1 answer it. If it's something disturbing, you
2 know, that the inmate is upset about something,
3 or if the counselor would call us and say the
4 inmate's upset, something happened to his ---
5 you know, that they need to speak to someone, we
6 may bring them over.

7 There are instances where we bring them
8 over, but that's on a case-by-case basis. We
9 just don't --- you know, an inmate doesn't write
10 us and say I need to see you and we bring them
11 over. That doesn't happen. We want to know
12 what they're coming over about, what their
13 concern is, what their question is.

14 Q. Would it be fair to say to be parole
15 eligible, inmates a lot of times are recommended
16 that they complete certain courses, anger
17 management courses and different things like
18 that?

19 A. Yes.

20 Q. Who typically, if anyone, decides what
21 courses they need or are required to be parole
22 eligible?

23 A. Initially, the corrections counselors do
24 assessments and they recommend programming.

25 Q. And the corrections counselors are

1 Department of Corrections employees?

2 A. They are.

3 Q. What role, if any, do the unit managers play
4 in recommending or helping or assisting
5 with ---?

6 A. I'm not exactly sure how their chain of
7 command is, their system works as far as that.

8 Q. Now, let's talk about inmates who have been
9 out on parole and have been returned because of
10 violations or new crimes.

11 A. Okay.

12 Q. If an inmate is out on parole and commits a
13 new crime or a technical violation, is sent back
14 to Coal Township, what does the institutional
15 parole officer do, and what information do they
16 have? What do they do with that inmate?

17 A. Initially, when an offender is brought back
18 as a parole violator, we notify the field agent
19 that this so and so has arrived at Coal
20 Township. This agent will be assigned the case.
21 We pretty much wait for the field to give us the
22 information we need, because the violation is
23 still a part of the field's procedure, you know,
24 getting us the material, establishing the
25 violations, sending that in. We will stand a

1 hearing for the field agent, but we're pretty
2 much just --- for lack of a better term, liaison
3 between the field agent and the hearing
4 examiner. We're like the gap between the
5 paperwork flow.

6 Q. Where is the field?

7 A. The field would be the supervising agent out
8 on the street in one of our district or sub
9 offices.

10 Q. Now, when an inmate is released on parole,
11 are they required to have a home plan?

12 A. When an inmate is released on parole, we
13 have to have somewhere --- we have to have it
14 documented where they're going. It doesn't
15 necessarily need to be a home plan. It could be
16 a community corrections center.

17 Q. Okay. And depending on where that is
18 depends on what field agent is assigned to them?

19 A. Correct.

20 Q. And who does the field agent --- what is
21 their chain of command? Who do they report to?

22 A. The chain of command would be the field
23 agent, parole supervisor in the field, a
24 district director, or --- excuse me, it could be
25 a deputy district director, a district director,

1 and then a regional director, and then into our
2 director of probation and parole services, which
3 that's not the correct title of that person
4 anymore. It's executive director of something,
5 but I'm not sure what it is.

6 Q. So how do you get this information from the
7 field?

8 A. Well, the agent does the paperwork and the
9 field supervisor, and sometimes the district
10 director have to concur with it, but most of the
11 time, it's the field agent and the supervisor
12 get us the paperwork that establishes the
13 violations.

14 Q. And what, if anything, does the
15 institutional parole office do with that
16 information?

17 A. Well, at that time, we would present the
18 offender with his notice of hearing, the notice
19 establishing the violations. Back then, our
20 procedures were that we would schedule a
21 preliminary hearing for --- I'm sorry. Can I
22 get clarification? Are we talking any
23 violation? What kind of violation are we
24 talking, because there's different procedures?

25 Q. What are the differences between violations?

1 I don't know what I'm asking for.

2 A. Well, there's two separate violations.

3 There's technical parole violations.

4 Q. Okay.

5 A. Okay. That would be a violation hearing.

6 And then there's hearings for new convictions,

7 which would be ---.

8 Q. Okay. So the technical violation is when

9 you may have not complied with one of the

10 conditions of parole and a decision has to be

11 made whether you violated that technical

12 condition; correct?

13 A. Correct.

14 Q. And a new conviction, you don't --- if it's

15 actually a conviction, you don't need to have

16 any hearing on any sort of violation, because

17 that is a per se violation, period?

18 A. No. If there is a conviction --- if there's

19 a new conviction, the procedure is a revocation

20 hearing.

21 Q. Okay. Let's assume someone is out on parole

22 and they violate and get convicted of a new

23 crime and do their time on the new conviction.

24 How do they actually get back to Coal Township

25 physically? I mean what's the process?

1 A. Well, it depends on where they're at.

2 Q. Well, who decides where to send them? Do
3 they go back to the prison where they were
4 before or does it just depend?

5 A. That didn't used to be the case. I mean it
6 doesn't --- they don't necessarily come out of
7 the jail that they paroled from.

8 Q. When, as a general proposition, is a parolee
9 eligible for parole?

10 A. When is he eligible for parole?

11 Q. Correct. Not a violator, just a
12 general ---?

13 A. Just a general? At his minimum date.

14 Q. And how do you know what the minimum date
15 is?

16 A. The sentence status summary established by
17 the Department of Corrections.

18 Q. And how do you know the maximum date?

19 A. The same instrument, the sentence status
20 summary.

21 Q. From Department of Corrections?

22 A. His initial max date, his original max date.

23 Q. Does his max date ever change?

24 A. It can.

25 Q. Under what circumstances?

1 A. If an offender is a parole violator who
2 absconds his supervision and was declared
3 delinquent, the maximum date could change, or if
4 the offender is a convicted parole violator and
5 loses his street time, the original maximum date
6 could change.

7 Q. Who would determine what the new max date
8 would be?

9 A. For parole violators?

10 Q. Yes.

11 A. The Board of Probation and Parole, we have a
12 unit here in our central office that calculates
13 the new max date.

14 Q. Does any of the Department of Corrections
15 employees at the institution have the ability to
16 change the max date calculated by the
17 Pennsylvania Board of Probation and Parole?

18 A. The parole violation max date?

19 Q. Correct.

20 A. No, they do not.

21 Q. Why not?

22 A. That lies with the Parole Board.

23 Q. Well, if they know it's wrong, why can't
24 they just change it?

25 A. That's not the procedure. The Parole Board

1 establishes the new maximum date. They have no
2 authority to go change the date. They being the
3 Department of Corrections' record staff have no
4 authority to go change the max date that's been
5 recalculated.

6 Q. Well, I'm not just talking about records.
7 I'm talking about anyone ---. If the
8 Superintendent says no, if I tell you you're not
9 supposed to be here, Probation and Parole is
10 wrong, we'll just cut you loose, they can ---?

11 A. No, they cannot do that.

12 Q. Why not?

13 A. Because it's the Board's jurisdiction to
14 establish the max date, the back time owed.

15 Q. If an inmate, who is a parole violator, gets
16 a notice of a new calculated max date by the
17 Board of Probation and Parole, what mechanism,
18 if any, do they have to challenge that
19 calculation?

20 A. On their Board action itself, their decision
21 that comes back with the new parole violation
22 max date, there is a paragraph I believe at the
23 bottom that states that if you wish to appeal
24 this decision, I think they have 30 days from
25 the date it was mailed out, and it's date

1 stamped at the bottom. They have 30 days to
2 appeal from that date to the address at the top
3 of the Board action.

4 Q. And when you talk about the Board action, is
5 that what is --- what color of paper is that on?

6 A. Well, it was on green.

7 Q. Okay.

8 A. And now it's on white.

9 Q. It's on white now? Are they still called
10 green sheets?

11 A. We try to not use that term anymore.

12 Q. Okay. Why?

13 A. Because it was just confusing. I mean it is
14 actually a Board action is what it is. And the
15 lingo was changed to green sheet over the years
16 by the inmates because it came out on green
17 paper.

18 Q. So if an inmate has a problem with a
19 calculated max, at SCI-Coal Township, they
20 contact you?

21 A. Right.

22 Q. What steps, if any, would you take to remedy
23 the situation or address their concerns?

24 A. I would tell them that they need to write to
25 the address at the top of their Board action,

1 their green sheet, and you know, explain why
2 they think it's wrong or what their concern is
3 with that.

4 Q. Do you have a personal recollection of Kevin
5 Jessup or Damon Chappelle? They're both the
6 same person.

7 A. I do not.

8 ATTORNEY KEATING:

9 I have no further questions.

10 Counselor?

11 ATTORNEY TOBIN:

12 I do have some questions.

13 EXAMINATION

14 BY ATTORNEY TOBIN:

15 Q. Good morning, Ms. Shurock.

16 A. Good morning.

17 Q. My first one is just whether you went by the
18 name Pijar at any point.

19 A. I did. Pijar (corrects pronunciation),
20 P-I-J-A-R.

21 Q. And when did your name change from Pijar to
22 Shurock?

23 A. November of 2010.

24 Q. When you were the institutional parole agent
25 one, did you receive inmates' green sheets when

1 they would be issued --- or excuse me, Board
2 actions?

3 A. I would not necessarily receive them. Our
4 institutional parole assistants would receive
5 them. And then it depended --- the duties
6 changed several times. Sometimes we would give
7 the offenders a Board decision, but sometimes
8 the institutional parole agents would give them
9 out, too. We could all do that.

10 Q. And if the inmate had a question about what
11 was on his Board action, or as he would probably
12 call it, his green sheet, would someone from the
13 Institutional Parole Office address that
14 question?

15 A. It depends on what the question was. How do
16 I want to ask this? Are you getting
17 clarification on this specific offender or in
18 general because ---?

19 Q. Just generally. I just wanted to know --- I
20 understand your response about the request slip
21 question.

22 A. Okay.

23 Q. My question more specifically is was there a
24 procedure or something in place where when an
25 inmate got his green sheet or his Board action,

1 there would be a sit-down conversation with him
2 about that?

3 A. Well, okay, that's where I was going.
4 Again, there's two different procedures.
5 Offenders that have seen the Parole Board, at a
6 minimum, or a review, get a face-to-face.
7 Either they get a paroling action or they get
8 refused parole. We hand those out personally to
9 the inmates.

10 Offenders that have violated, whether it be
11 a technical violation or a new conviction, those
12 Board actions are mailed directly to the
13 offenders because of what I stated earlier; they
14 have 30 days to appeal that decision from the
15 date it's mailed out. So no, they are not met
16 with face-to-face; that decision is mailed
17 directly too them because of the timeliness
18 issue.

19 Q. Okay. And in terms of somebody who comes
20 back as a parole violator, and who wants to seek
21 re-parole, would they also get a Board Action or
22 a green sheet on their re-parole account?

23 A. It would depend on what the Board Action
24 states. If the Board Action stated to serve
25 their maximum sentence, they would have no ---

1 they would not be seeing the Parole Board again
2 for a re-parole. However, if they were
3 recommitted and a review date set, then yes,
4 they would see the Parole Board again.

5 Q. And so would those inmates get a
6 face-to-face on their re-parole application?

7 A. Correct. When it was time for them to see
8 the Board as a re-parole case, they would be met
9 with.

10 Q. You mentioned that if they were told they
11 had to serve their full max, then, if I'm
12 understanding correctly, they wouldn't get a
13 re-parole date. How is it determined that they
14 could have a re-parole hearing?

15 A. They wouldn't be. I mean if the Board
16 issued a decision to serve their max, that would
17 be their final decision, unless they filed an
18 appeal, like I stated, at the bottom of their
19 Board action.

20 Q. But if the Board decided that they could
21 have re-parole, then they would just go
22 through --- or what would happen? Would they be
23 seen every ---?

24 A. It would depend on what they gave them; if
25 they gave them a six-month review date, or a

1 year review date. Each time they would see him,
2 you know, they would see them, make a decision
3 based on that, and they could set another review
4 date, or they could re-parole them.

5 Q. So is it similar to the initial parole
6 process then?

7 A. Correct. It's the same thing. There is no
8 guarantee that they're getting re-paroled.

9 Q. Okay. When you were at Coal Township in
10 2009, were you still in the position of
11 institutional parole agent one?

12 A. In 2009? No. I was a two. I was only an
13 institutional parole agent one for six months.
14 I got promoted to a two after the six-month
15 training period was over. In 2009, I was a
16 parole agent two.

17 Q. And were your duties and responsibilities
18 any different from what you've already
19 described?

20 A. No.

21 Q. Okay. Who was your supervisor in 2009?

22 A. At that time, it was Brian Stout, S-T-O-U-T.

23 Q. Did you prepare, either as a parole agent
24 one or two --- you mentioned part of your duties
25 were getting the inmates --- I think you

1 mentioned getting the inmates ready for the
2 parole reviews?

3 A. Yes. That would be part of the pre-parole
4 process.

5 Q. And did you prepare paperwork, too, as part
6 of that process?

7 A. I would have prepared a summary document of
8 the materials that I gathered from the
9 Department of Corrections, a summary document to
10 give to the Parole Board.

11 Q. And you mentioned revocation hearings after
12 somebody has been convicted of a new crime. Are
13 those also known as Gagnon I and II hearings?

14 A. No, they are not.

15 Q. What is a Gagnon hearing?

16 A. A Gagnon hearing is before a Judge. That's
17 a county violation.

18 Q. And so the Parole Board had its own separate
19 revocation hearing process?

20 A. Correct.

21 Q. Was there any paperwork that was generated
22 for a revocation hearing?

23 A. I'm not sure of the question.

24 Q. As an institutional parole agent, did you
25 prepare any paperwork for an inmate who was

1 having a revocation hearing?

2 A. No, we would not have.

3 Q. Do you know if anyone at the DOC or in the
4 Parole Board's institutional office prepared
5 paperwork?

6 A. We would not have.

7 Q. Did you attend any revocation hearings for
8 the inmate who was being possibly revoked?

9 A. It is possible. We do stand revocation
10 hearings. I don't personally remember doing
11 his. I well could have, but I don't know. But
12 we do stand revocation hearings.

13 Q. Did you say stand?

14 A. Yes. Yeah, that's a term we use for we're
15 the one present doing the hearing. The field
16 agent does not have to come in --- the field
17 agent that was supervising the offender does not
18 have to come in to do the hearing. The
19 institutional agent can stand up the hearing for
20 the field agent.

21 Q. I see. So does the institutional agent
22 provide testimony at the hearing?

23 A. The only testimony that we would be provided
24 for a revocation hearing would be the conviction
25 paperwork.

1 Q. And after the revocation hearing happens and
2 a decision is made, is there paperwork generated
3 to document what that decision was?

4 A. That would be the Board action, the green
5 sheet.

6 Q. And would the inmate get a copy of that?

7 A. Yes. It would be mailed directly to him
8 from our central office.

9 Q. Would that also be in his institutional
10 parole file?

11 A. Yes, we would also get a copy.

12 Q. You testified earlier that you --- I believe
13 you said that you would respond to inmate
14 request slips if you were able to within your
15 duties, and if not, you would point the inmate
16 in the right direction. Did you ever assist an
17 inmate in sorting out his parole violator
18 calculation?

19 A. No, I would never have done that.

20 Q. That's something that's exclusively done by
21 the central office?

22 A. That is correct. I have never been trained
23 in that. There's a specific unit that is
24 trained in time calculations.

25 Q. Do you know the name of that unit?

1 A. It's changed over the years. I believe now
2 it's the case analysis division.

3 Q. Okay. If you wouldn't mind looking at ---
4 there's four sheets of paper that I e-mailed to
5 Mr. Keating yesterday. If you could take a look
6 at those?

7 ATTORNEY KEATING:

8 Do you want them marked as Exhibit
9 Number One?

10 ATTORNEY TOBIN:

11 That would be great; yes.
12 (Shurock Exhibit One marked for
13 identification.)

14 ATTORNEY KEATING:

15 Okay. We're going to mark the
16 whole pack as Exhibit Number One; okay,
17 Jennifer?

18 ATTORNEY TOBIN:

19 That sounds good.

20 ATTORNEY KEATING:

21 Okay.

22 ATTORNEY TOBIN:

23 And if you could make sure they're
24 in the order of the dates at the top right-hand
25 corner.

1 ATTORNEY KEATING:

2 They are.

3 ATTORNEY TOBIN:

4 Okay.

5 BY ATTORNEY TOBIN:

6 Q. So Ms. Shurock, if you could take a look at
7 those four sheets of paper and then just let
8 me --- you don't have to read them all right
9 now, but just let me know after you've had a
10 chance to thumb through them.

11 WITNESS REVIEWS DOCUMENTS

12 A. Yes.

13 BY ATTORNEY TOBIN:

14 Q. Do you recognize these documents?

15 A. I mean that is my writing. That is my
16 signature, yes. Do I remember doing it, no.

17 Q. Well, those were my two next questions.

18 A. Okay.

19 Q. These were request slips that you responded
20 to from Mr. Jessup?

21 A. Yes, ma'am.

22 Q. Okay. Do you recall sending him any other
23 documents other than these four?

24 A. I do not. I don't know what else I would
25 have sent him.

1 Q. As an institutional parole officer, did you
2 ever respond to grievances made by inmates?

3 A. No, I would not do that.

4 Q. Did the Parole Board itself have a grievance
5 system or was it just the appeal procedure you
6 described earlier?

7 A. It would just be the appeal procedure. The
8 grievance procedure is through the Department of
9 Corrections. The Parole Board does not have a
10 grievance procedure.

11 Q. So just to clarify, the inmate who has a
12 question about parole violator calculation or
13 other calculation done by the Parole Board could
14 only use that appeal procedure?

15 A. That is correct.

16 Q. On the second page of this exhibit, in the
17 upper right-hand corner, it's dated 4/22/09.

18 A. Okay.

19 Q. In your response, it says Mr. Jessup, I have
20 copies of the paperwork your attorney sent. Our
21 office here does not handle this. You need to
22 go through the procedures on your Board Action
23 in regard to appeals.

24 A. Okay.

25 Q. Did I read that correctly?

1 A. Yes.

2 Q. What paperwork are you referring to in that
3 response; the paperwork that your attorney sent
4 you ---?

5 A. I would believe that it would be what ---
6 the offender must have sent something to our
7 office. I mean, I have copies ---.

8 ATTORNEY KEATING:

9 If you recall.

10 A. Yeah, I don't know. At this point, I don't
11 know what I said three years ago.

12 BY ATTORNEY TOBIN:

13 Q. Sure. Would that paperwork be in Mr.
14 Jessup's parole file?

15 A. I don't know. At this point in time, I
16 don't know. They do purge the files once
17 offenders leave. I don't know.

18 Q. Okay. Do you recall whether you responded
19 to any letters from attorneys?

20 A. I would not have.

21 Q. And why not?

22 A. Because we don't do that. Usually, if an
23 attorney would call our office, we refer them to
24 our Office of Chief Counsel. We kind of shy
25 away from talking to attorneys.

1 Q. I don't blame you. Okay. And so then the
2 next question is kind of similar, just take a
3 look at the next document; 4/28/09 is the date.
4 Would your answer be the same there, that the
5 letters sent by the attorney, you wouldn't have
6 responded to those letters?

7 A. That is correct.

8 Q. So it's just reading through these four
9 request slips, it looks like your response to
10 Mr. Jessup's complaint was that he needed to
11 contact the Parole Board in Harrisburg?

12 A. That is correct.

13 Q. Do you recall taking any other steps or
14 doing anything else besides issuing these
15 responses?

16 A. No, I would not have done anything else.

17 Q. Not called the Parole Board in Harrisburg to
18 try to find out what was going on?

19 A. Nope. I would not have.

20 Q. I know you said that you had nothing to do
21 with calculating parole violator max dates. Is
22 that also the case for calculating back time?

23 A. That is correct.

24 Q. And you mentioned earlier that you got some
25 information about the inmate's sentence from the

1 sentence status sheet that was generated by the
2 Department of Corrections. Is that also known
3 as the DC-16E?

4 A. It is.

5 Q. And did you have access to that on the DOC's
6 computer system?

7 A. Yes, I would have access to it.

8 Q. If you had questions about anything on that,
9 were you able to talk with records about your
10 questions?

11 A. Yes.

12 Q. Do you recall ever discussing an inmate's
13 sentence structure with records?

14 A. I have discussed sentence structures with
15 records; yes.

16 Q. And in this case, I'm guessing the answer is
17 no, but do you remember whether you discussed
18 sentence issues with records for Mr. Jessup?

19 A. I don't recall. I don't know.

20 Q. Did you ever meet with Mr. Jessup face to
21 face about the issues in these request slips?

22 A. I don't recall.

23 Q. If you had done --- had a face-to-face
24 meeting, would you have put a note in his file?

25 A. Probably. I don't know. It depends on what

1 it was. If it was general questions, no.

2 Q. You stated earlier that the Department of
3 Corrections doesn't have the authority to change
4 any calculations provided by the Parole Board.
5 And I think that you testified that it was ---
6 that was because that's not the procedure in
7 place. Is there a Parole Board regulation that
8 provides that the DOC cannot change Parole Board
9 calculations?

10 A. I don't know.

11 Q. I guess what I'm trying to understand is
12 where you came by that understanding, that the
13 DOC cannot change the calculations. What is the
14 basis for that belief?

15 A. I mean, I've worked for the Parole Board 20
16 years. And our unit here in central office is
17 the one who calculates back time. And we give
18 that information to the Department of
19 Corrections. It's always been that way.

20 Q. Okay. Did you have a liaison or a point
21 person at the Harrisburg central office to talk
22 with about an inmate's parole issues, if the
23 inmate was in your caseload?

24 A. Could I have made a phone call to Harrisburg
25 to someone to ask a question?

1 Q. Well, I guess that's a separate question,
2 but go ahead and answer that one.

3 A. I mean we have access to anyone in our
4 central office. Yes, I can make a phone call.

5 Q. Did you have a specific person who was
6 associated with reviewing the parole cases in
7 your caseload, apart from your supervisor at
8 Coal Township?

9 A. No. There is no one assigned --- there is
10 no one particular person assigned to be a
11 contact person.

12 Q. Okay. So you could call somebody in the
13 case analysis division?

14 A. If I needed to.

15 Q. For a returning parole violator, you
16 mentioned that there --- that you have to get
17 from the field agent some paperwork that
18 establishes the violation. What is that
19 paperwork?

20 A. It would be our arrest report series.

21 Q. I'm sorry, did you say series?

22 A. Yeah, arrest report series.

23 Q. And what does that consist of?

24 A. It would consist of a notice of charges and
25 hearings. It would consist of notice of

1 technical violations and/or notice of new
2 charges, and a supervision history report.

3 Q. And are all of those documents required when
4 someone is returned as a parole violator?

5 A. They're required if we go to a hearing; yes.

6 Q. Under what circumstances would you not go to
7 a hearing?

8 A. If the offender would waive his right to a
9 hearing.

10 Q. Okay. And is there a form that the offender
11 would have to sign to waive his right to a
12 hearing?

13 A. There is.

14 Q. It's just called a waiver?

15 A. Yeah, I believe it's like waiver --- now
16 wait --- waiver of hearing and admission form.
17 There's a title to it and there's a number
18 assigned to it.

19 Q. So there would either be these documents
20 that establish the violation or a waiver when
21 somebody is returned as a parole violator?

22 A. Yes. Yes. Not initially when they're
23 brought in the door, but yes, before the
24 hearing.

25 Q. And if the inmate had a question about any

1 aspect of the paperwork or the revocation
2 hearing, I know you said you would stand for the
3 hearings. Would you also assist the inmate in
4 figuring out his problem at that point?

5 A. If we could. It's usually at the hearing is
6 when he gets all of that paper, he or his
7 attorney who is there with him. He or his
8 attorney could raise a question on it during the
9 hearing process.

10 Q. And where are those hearings held?

11 A. They're held in SCI --- they're held in the
12 prisons.

13 Q. In a conference room or something?

14 A. Yes.

15 Q. Do you know in Mr. Jessup's case what the
16 basis was for any of his parole violator max
17 dates?

18 A. I do not.

19 Q. When you were trained the five or six weeks
20 of basic training that you had at the DOC
21 Training Academy, ---

22 A. Yes.

23 Q. --- was that training only related to Parole
24 Board functions or did you also have some
25 training on DOC functions?

1 A. It was strictly Parole Board functions.

2 Q. So you just used their building?

3 A. Correct.

4 Q. Did you subsequently have any training on
5 DOC functions, in particular, records office
6 operations?

7 A. No.

8 ATTORNEY KEATING:

9 They have enough training as it is
10 without getting cross trained with DOC, I think,
11 Jennifer, if you would ask her that.

12 A. Yes.

13 ATTORNEY KEATING:

14 But they have training here today
15 and we're flooded with trainees.

16 ATTORNEY TOBIN:

17 Lots of trainees.

18 ATTORNEY KEATING:

19 Yes.

20 BY ATTORNEY TOBIN:

21 Q. All right. I just have a few more. Have
22 you ever been a party, either a plaintiff or a
23 defendant in a civil lawsuit?

24 A. No.

25 Q. Have you ever been a witness in a civil

1 lawsuit?

2 A. No, ma'am.

3 Q. I'm sorry, my air conditioning didn't allow
4 me to hear your answer.

5 A. I hear. No, ma'am, I did not. I was not.

6 Q. Okay. Before the deposition started today,
7 did you review any documents?

8 A. I did not.

9 Q. And other than your counsel, who is with you
10 at the deposition, Mr. Talaber, did you talk to
11 anyone about the deposition before today?

12 A. I did not.

13 ATTORNEY KEATING:

14 Well, you spoke to ---.

15 A. Well, Mr. Keating, just about the general
16 procedure but ---.

17 ATTORNEY TALABER:

18 Mr. Robinson?

19 A. Oh ---.

20 BY ATTORNEY TOBIN:

21 Q. Did you talk about the substance of the
22 deposition with Mr. Keating?

23 A. I mean just basically what would happen, you
24 know, that he would ask me questions, you would
25 ask me questions.

1 Q. Okay. Just what would happen at the
2 deposition?

3 A. Right, what would go on at the hearing.

4 Q. Have you ever been charged with a crime?

5 A. No.

6 ATTORNEY TOBIN:

7 I have no further questions.

8 ATTORNEY KEATING:

9 I have a couple of follow-up
10 questions.

11 REEXAMINATION

12 BY ATTORNEY KEATING:

13 Q. Does the Department of Corrections have the
14 authority to add additional parole conditions on
15 a parolee who is out on parole?

16 A. Excuse me. Does a parole agent have ---?

17 Q. Does the Department of Corrections have the
18 authority to add additional parole conditions
19 for a parolee who is out on the street on
20 parole?

21 A. No, they do not.

22 Q. Is there a Parole Board rule or regulation
23 that says the Department of Corrections does not
24 have such an authority?

25 A. I don't know, honestly.

1 Q. Does the Board of Probation and Parole, are
2 they allowed to grant a parolee a Presidential
3 pardon and erase the original conviction of a
4 parolee?

5 A. The Parole Board?

6 Q. Yes.

7 A. No, sir.

8 Q. Is there a rule or policy within the Parole
9 Board that says that you can't do that?

10 A. Well, there's the Board of Pardons, but no.

11 Q. Okay. Is the current name of the section in
12 Probation and Parole which calculates the
13 maximum dates of parole violations, is that the
14 case analysis division, if you know?

15 A. I believe that's the title of the division.

16 Q. Okay. Is that John Janis?

17 A. It would be his unit. It would be under
18 him, yes. That unit is under John Janis.

19 Q. Okay. So whatever unit he is with, that's
20 the unit you were making reference to?

21 A. Yes, sir.

22 ATTORNEY KEATING:

23 Okay. I have no further questions.
24 Jennifer?

25 ATTORNEY TOBIN:

1 I do not.

2 ATTORNEY KEATING:

3 Okay. Good. We're done.

4 ATTORNEY TALABER:

5 Wait. Okay. One more
6 clarification, because I think Jennifer, you
7 stepped on her response. Did you talk to
8 anybody else?

9 A. Mr. Talaber that is sitting here with me,
10 the attorney, before him, Alan Robinson, the
11 other Parole Board attorney was handling the
12 case, and I spoke with him this morning, before
13 we came in here. And he had to step away for a
14 meeting, and that is why Mr. Talaber is here.

15 ATTORNEY TOBIN:

16 Okay. And he is also a Parole
17 Board attorney?

18 A. Correct. Assistant Counsel.

19 ATTORNEY KEATING:

20 Okay. Good. Are we done,
21 Jennifer?

22 ATTORNEY TOBIN:

23 I don't have any more questions.

24 ATTORNEY KEATING:

25 Good. Thank you very much.

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HEARING CONCLUDED AT 10:09 A.M.

* * * * *

1 COMMONWEALTH OF PENNSYLVANIA)

2 COUNTY OF CAMBRIA)

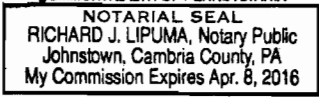
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4 CERTIFICATE

5 I, Richard J. Lipuma, a Notary Public
6 in and for the Commonwealth of Pennsylvania, do
7 hereby certify:

8 That the foregoing proceedings,
9 deposition of Jennifer Shurock, was reported by
10 me on 08/16/2012 and that I Richard J. Lipuma
11 read this transcript and that I attest that
12 this transcript is a true and accurate record
13 of the proceeding.

14 That the witness was first duly sworn
15 to testify to the truth, the whole truth, and
16 nothing but the truth and that the foregoing
17 deposition was taken at the time and place
18 stated herein.

19 I further certify that I am not a
20 relative, employee or attorney of any of the
21 parties, nor a relative or employee of counsel,
22 and that I am in no way interested directly or
23 inc action.

24 A rectangular notary seal stamp for Richard J. Lipuma, Notary Public in Cambria County, PA. It states his commission expires on April 8, 2016.
25


Court Reporter

Form DC-135A

INMATE'S REQUEST TO STAFF MEMBER

Commonwealth of Pennsylvania
Department of Corrections

INSTRUCTIONS

Complete items number 1-8. If you follow instructions in preparing your request, it can be responded to more promptly and intelligently.

1. To: (Name and Title of Officer)

Ms. DYAR

Date:

4/21/09

3. By: (Print Inmate Name and Number)

KEVIN JESSUP CX 8799

4. Counselor's Name

FOULDS

5. Unit Manager's Name

DUNN

6. Work Assignment

NONE

7. Housing Assignment

B2 26 cell

8. Subject: State your request completely but briefly. Give details.

A MISTAKE OR ERROR HAS BEEN MADE, I NEED TO TALK TO YOU IMMEDIATELY OR SOMEONE IN PAROLE IN REGARDS TO WHY I AM STILL HERE. MY ORIGINAL MAX DATE WAS 1-26-07 I'VE BEEN IN COAL TOWNSHIP FROM 9-26-01 UNTIL 7-18-07 & NOW I'M BACK AGAIN. MY FEDERAL SENTENCE WAS 24 MONTHS AND IT BEGAN 7-18-07 I WAS RELEASED FROM FEDERAL CUSTODY ON 4-14-09 PLEASE EXPLAIN WHERE DID THE TIME SPENT IN COAL TOWNSHIP GET CREDITED TO BECAUSE I HAVE BEEN INCARCERATED SINCE 9-26-01 THRU 7-18-07 AND NOW I'M BACK HERE AGAIN WHEN I SHOULD NOT BE.

Response (This section is for the response only)

You will be receiving a final Board Action in the mail - You could not begin serving your backtime until you were done w/ your Federal Sentence - The Board Action will show your release date + your PV max date - If you wish to appeal it, the instructions will be listed

To DC-14 CAR only ☐To DC-14 CAR and DC-15 IRS ☐

at the bottom

Staff Member Name

Print

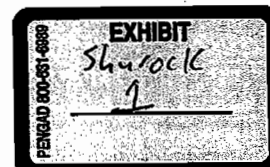
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Sign

Date

4-22-09

Revised July 2000



Form DC-135A		Commonwealth of Pennsylvania Department of Corrections	
INMATE'S REQUEST TO STAFF MEMBER		INSTRUCTIONS Complete items number 1-8. If you follow instructions in preparing your request, it can be responded to more promptly and intelligently.	
1. To: (Name and Title of Officer) <u>MS. P. JAR Parole</u>	2. Date: <u>4/22/09</u>	PA. BOARD OF PROBATION & PAROLE 08 APR 23 PM 2:18 SCI-COAL TOWNSHIP	
3. By: (Print Inmate Name and Number) <u>Kevin Jessup CX 8799</u> <u>Ka [Signature]</u> Inmate Signature	4. Counselor's Name <u>FOLIOS</u>		
6. Work Assignment <u>NONE</u>	5. Unit Manager's Name <u>DUNN</u>		
7. Housing Assignment <u>B2 cell 26</u>			
8. Subject: State your request completely but briefly. Give details.			
<p><u>MS. P. JAR,</u></p> <p><u>I RECEIVED YOUR RESPONSE BUT</u></p> <p><u>I HAVE ^{NEW} COURT DOCUMENTS YOU NEED</u></p> <p><u>TO REVIEW ALSO. I RECEIVE A TOTALLY</u></p> <p><u>NEW FEDERAL SENTENCE ON NOV. 24, 2008</u></p> <p><u>CAN YOU "PLEASE" SCHEDULE AN APPOINTMENT</u></p> <p><u>FOR ME TO SEE YOU SO I PRESENT</u></p> <p><u>THESE DOCUMENTS TO YOU AND YOU COULD</u></p> <p><u>POSSIBLY ANSWER A FEW QUESTIONS.</u></p> <p><u>THANKS IN ADVANCE</u></p>			
<p>9. Response (This Section for Staff Response Only)</p> <p><u>Mr. Jessup - I have copied the paperwork your</u></p> <p><u>attorney sent -</u></p> <p><u>Our office here does not handle this -</u></p> <p><u>You need to go through the procedures on your Board</u></p> <p><u>Action in regard to appeals!</u></p>			
To DC-14 CAR only <input type="checkbox"/>		To DC-14 CAR and DC-15 IRS <input type="checkbox"/>	

Staff Member Name

Print

Sign

Date

4/28/09

Form DC-135A		Commonwealth of Pennsylvania Department of Corrections	
INMATE'S REQUEST TO STAFF MEMBER		INSTRUCTIONS	
09 APR 29 AM 9:37 PA. BOARD OF PROBATION & PAROLE		Complete items number 1-8. If you follow instructions in preparing your request, it can be responded to more promptly and intelligently.	
1. To: (Name and Title of Officer) MS. P. JAR Parole	2. Date: 4/28/09		
3. By: (Print Inmate Name and Number) KEVIN JESSUP ex 8799 <i>[Signature]</i> Inmate Signature	4. Counselor's Name FOLDS	5. Unit Manager's Name DUNN	
6. Work Assignment NONE	7. Housing Assignment B-2 26		
8. Subject: State your request completely but briefly. Give details.			
<p>MS. P. JAR, I HAVE TO TALK TO YOU PERSONALLY.</p> <p>I JUST RECEIVED MY GREEN SLIP</p> <p>CAN YOU CALL ME OVER SO YOU CAN</p> <p>EXPLAIN SOMETHINGS TO ME, ALSO I HAVE</p> <p>A NEW SENTENCE THAT ACCURED WHEN</p> <p>I WAS IN FEDERAL COURTS I WILL SHOW</p> <p>YOU THE COURT ORDER AND THE NEW</p> <p>SENTENCE I RECEIVED.</p>			
9. Response: (This Section for Staff Response Only)			
<p>Please see previous responses —</p> <p>I cannot answer your questions — they can be</p> <p>addressed by our Office in Harrisburg — I see your</p> <p>attorney went letters on your case — you need</p> <p>to appeal your Board Action if you have issues!</p>			
To DC-14 CAR only <input type="checkbox"/>		To DC-14 CAR and DC-15 IRS <input type="checkbox"/>	

Staff Member Name

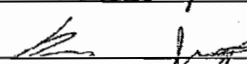
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[Signature]
Sign

Date

4/29/09

26

Form DC-135A INMATE'S REQUEST TO STAFF MEMBER		Commonwealth of Pennsylvania Department of Corrections TOWNSHIP	
09 MAY 19 AM 10:26 PA. BOARD OF PROBATION & PAROLE		INSTRUCTIONS Complete items number 1-8. If you follow instructions in preparing your request, it can be responded to more promptly and intelligently.	
1. To: (Name and Title of Officer) MS. PEAR Parole		2. Date: 5/18/09	
3. By: (Print Inmate Name and Number) Kevin Jessup CX 8799  Inmate Signature		4. Counselor's Name Foulds	
		5. Unit Manager's Name Dunn	
6. Work Assignment GLP		7. Housing Assignment B2 26	
8. Subject: State your request completely but briefly. Give details.			
<p>26 previously noted DOES NOT include time!! parole calculations!! our office check address on Board Decision</p> <p>MS. PEAR THIS is my 3rd & Final attempt to discuss this matter with you. For some apparent reason you refuse to see me. I received my Green Sheet by mail and I don't understand it. From Jan. 28, 1995 to Apr. 8, 2001 I was incarcerated at SCI Coal. From Sept. 26, 2001 to July 18, 2007 I was incarcerated at Coal S.C.I. my new Federal sentence was 24 months, & I served that sentence in a Federal Jail. There's a serious error in my sentence calculation that nobody's acknowledging. Can you please schedule me to see you or someone from Parole on this matter.</p> <p>Please see my attached 4/28/09 response to your previous requests —</p> <p>I have also attached a copy of the Board Decision if you wish to appeal the decision, follow the instructions</p>			
To DC-14 CAR only <input type="checkbox"/>		To DC-14 CAR and DC-15 IRS <input type="checkbox"/>	

Staff Member Name

Print

Lujan

Sign

Date

5/26/09